

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Action
)	No. 13-10200-GAO
)	
DZHOKHAR A. TSARNAEV, also)	
known as Jahar Tsarni,)	
)	
Defendant.)	
)	

BEFORE THE HONORABLE GEORGE A. O'TOOLE, JR.
UNITED STATES DISTRICT JUDGE

EXCERPT - JURY TRIAL DAY TWENTY-NINE

TESTIMONY OF DANLING ZHOU

John J. Moakley United States Courthouse
Courtroom No. 9
One Courthouse Way
Boston, Massachusetts 02210
Monday, March 9, 2015
10:16 a.m.

Marcia G. Patrisso, RMR, CRR
Official Court Reporter
John J. Moakley U.S. Courthouse
One Courthouse Way, Room 3510
Boston, Massachusetts 02210
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Mechanical Steno - Computer-Aided Transcript

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I N D E X

	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
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WITNESSES FOR THE
GOVERNMENT:

DANLING ZHOU

By Mr. Chakravarty 4

E X H I B I T S

GOVERNMENT'S

EXHIBITDESCRIPTIONFOR IDRECEIVED

21-1	Photograph		18
21-2	Photograph		18
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P R O C E E D I N G S

* * *

MR. CHAKRAVARTY: Your Honor, the government calls Danling Zhou.

DANLING ZHOU, duly sworn

THE CLERK: Have a seat. State your name, spell your last name for the record, keep your voice up and speak into the mic so everyone can hear you, okay?

THE WITNESS: My name is Danling Zhou. My last name spelled Z-H-O-U; my first name D-A-N-L-I-N-G.

DIRECT EXAMINATION

BY MR. CHAKRAVARTY:

Q. Good morning.

A. Good morning.

Q. Ms. Danling, I'm over here.

And just for the record, you spelled your last name -- is it Z-H-O-U?

A. Yes.

Q. Ms. Zhou, how old are you?

A. Twenty-four.

Q. And where are you from?

A. China.

Q. Where in China?

A. Sichuan, Chengdu.

Q. Sichuan Province in China, and Chengdu, the city?

1 A. Yes.

2 Q. And did you grow up there?

3 A. Yes, I grow up there.

4 Q. Did you go to college there?

5 A. No, I go to college in Wuhan, Hubei.

6 Q. Okay. And that's also in China?

7 A. Yes, that's also in China.

8 Q. And can you spell the American version of what you just
9 said?

10 A. The province is H-U-B-E-I, and the city is Wuhan,
11 W-U-H-A-N.

12 Q. And is Mandarin your native language?

13 A. Yes.

14 Q. And do you understand English?

15 A. Yes.

16 Q. So if you have difficulty understanding me or if I'm
17 speaking too softly, if you'd please let me know.

18 A. Okay.

19 Q. And the microphone in front of you, if you want to bring
20 that a little bit closer, then everybody in the court will be
21 able to hear you.

22 A. Okay.

23 Q. Thank you.

24 Is your family still in China?

25 A. Yes.

1 Q. And do you have any brothers or sisters?

2 A. No, I'm the only child.

3 Q. Okay. And do you have extended family in China as well?

4 A. Yes.

5 Q. When did you come to the United States?

6 A. Two years ago, '13 -- actually, three years ago, 2012.

7 Q. And why did you come to the United States?

8 A. Study, BU, Boston University.

9 Q. You said you went to college in China. Did you graduate
10 with a degree?

11 A. Yes; economics and mathematics, bachelor degree.

12 Q. And so when you decided to come to the U.S. to study, why
13 did you choose the U.S. of other places?

14 A. I'm here to study for actuary. Then there's like big
15 program, Society of Actuaries, that's South -- North
16 American -- South American based, so I choose U.S. to study.

17 Q. Okay. And so the study of actuary, many people don't know
18 what that is. If you wouldn't mind explaining it to us.

19 A. "Actuary" is a little hard to explain. So it's basically
20 for -- most of them is for insurance company. So we calculate
21 the risks for different scenarios and how we should hold our
22 monies, how we should decide our assets to go in order to pay
23 out the liabilities we have.

24 Q. And it assesses kind of future risks?

25 A. Yes.

1 Q. Okay. But it uses a lot of math. Is that fair to say?

2 A. Yes.

3 Q. And you mentioned that the Society of Actuaries is based
4 in America?

5 A. Yes, mostly U.S.

6 Q. And so did you apply to grad school programs here?

7 A. Yes, in Boston University, Actuarial Science Department.

8 Q. And is that where you began to attend in 2012?

9 A. Yes.

10 Q. Why did you choose Boston?

11 A. Because when I got the offer from Boston University, the
12 first thing I heard about Boston, I just feel like it's a nice
13 city, the view is beautiful, and it's very close to the ocean.
14 That's all I want, so I take the offer.

15 Q. And had you been to the U.S. before?

16 A. Yes. When I was in high school there was like a school
17 organization -- a school organized the event. So we go to
18 California for a couple of days -- couple of weeks.

19 Q. And so how long of a program was the BU graduate program
20 that you were in?

21 A. It's two years' program.

22 Q. And is that a master's program?

23 A. Yes.

24 Q. And when you came to the United States, did you
25 have -- get a visa to come to the U.S.?

1 A. Yes, a student visa.

2 Q. Okay. And that allows you to come to the U.S. in order to
3 study?

4 A. Yes.

5 Q. And are you what's called an "international student"?

6 A. Yes.

7 Q. And that means you were still a national of China; you
8 just had permission to come to the U.S. and study?

9 A. Yes.

10 Q. Was there a community of students like you here at BU?

11 A. There is a lot of Chinese and international students in
12 BU.

13 Q. And what do you attribute the reason why there's so many
14 international students at BU?

15 A. BU is very big school. And I guess like lots of
16 international students come, so we have multi-culture things
17 and people thinking different ways. So we talk to different
18 people. And I guess it's a culture -- multi-culture thing. I
19 don't know.

20 Q. A multicultural environment?

21 A. Yeah.

22 Q. In addition to your coursework for your master's degree,
23 did you also do research?

24 A. I don't do research, but I find a job to -- schoolwork to
25 help one of the professor in administrative department to do

1 the research work. So I'm working as a research assistant.

2 Q. Okay. So you're a research assistant, but you're not
3 actually doing the experiments and that kind of thing?

4 A. Not experiment. It's more like -- it's more for finance.
5 So I use software to help the professor to build a model of the
6 regression stuff.

7 Q. And as part of that job, was there an office space where
8 you and others would do your work as assistants?

9 A. Yes, there's a couple of other students. We share the
10 office; when we are working we can use that space and a
11 computer to do our work.

12 Q. At some point in your BU experience did you come to know
13 someone named Lu Lingzi?

14 A. Yes, she's one of my very good friend.

15 Q. And the Chinese convention of saying the name and the
16 surname, is that the reverse of the American way; so the last
17 name goes first and the first name goes second?

18 A. Yes.

19 Q. So in America we would call her "Lingzi Lu"?

20 A. Yes.

21 Q. How did you know Lingzi?

22 A. When we first come here we took a math class together, so
23 we start to know each other and become very good friend. And
24 we did our projects together for that class, so we become very
25 close.

1 Q. Do you remember that class, what class that was?

2 A. Yeah, that's a linear regression class.

3 Q. Linear regression. So it's another --

4 A. Math class.

5 Q. -- math class?

6 A. Yes.

7 Q. Was Lingzi, like you, a Chinese student?

8 A. Yes.

9 Q. And was she, like you, a Chinese national who came here on
10 a visa?

11 A. Yes.

12 Q. And what was she studying?

13 A. She studying statistics.

14 Q. And what kinds of things did you do with Lingzi?

15 A. A lot of things girls will do. So we shopping together,
16 talking together, and we are also cooking, just enjoying.

17 Q. Lingzi's family, were they also in China?

18 A. Yes. Most of their family -- most of her family's in
19 China, and her aunt's in the U.S.

20 Q. Your voice trailed off a little. Did you say her aunt
21 lives in the U.S.?

22 A. Yes.

23 Q. Okay. And is that her aunt Helen?

24 A. Yes.

25 Q. Did she have any pets?

1 A. Yes, a dog. A small, cute dog.

2 Q. How do you know that?

3 A. She talks a lot about the dog and show me pictures and
4 videos, so I know that.

5 Q. Would she communicate with her parents and friends back in
6 China?

7 A. Yes. Sometimes she will call them, Skype them, and
8 WeChat. That's kind of software we use to texting, like,
9 Whatsapp.

10 Q. So WeChat is a software application like, what did you
11 say, Whatsapp is another --

12 A. Yeah, kind of like Whatsapp.

13 Q. Okay. That's a way to communicate with people in China?

14 A. Yeah.

15 Q. Did you take any trips together with Lingzi?

16 A. Yes, we went to Orlando together in March. Middle of
17 March, I think, during the spring break.

18 Q. Okay. Spring break of 2013?

19 A. Yes.

20 Q. So that was about a month or less before the marathon?

21 A. Yes.

22 Q. Where did you go in Orlando?

23 A. Disneyland and Universal Studio.

24 Q. Aside from Lingzi, did you have another group of friends
25 that you -- would socialize with you?

1 A. Yes, some other friends.

2 Q. I'm going to draw you now to the day of the bombing.

3 A. Okay.

4 Q. Can you describe what you did when you got up that
5 morning?

6 A. So school has that day off, so we have a day just to
7 exploring in Boston. And marathon is a big thing here. It's
8 very important. So I think I should go to see how people
9 celebrate marathon. And then I ask Lingzi -- because we are
10 very close to each other, we almost do everything together. So
11 I ask her to go with me. And then she says she will have exam
12 coming soon so she want to study. So I said okay.

13 So I talk to two of my other friend, who we decide to go,
14 and the day before we are going or at the morning of that
15 day -- I can't remember. And then she says she still want to
16 go with us. So I'm very happy she can go with me.

17 So we went together. We take the train to -- around that
18 place, and then we get off one stop earlier, I guess, and then
19 we walk to the Prudential Center because I think we can go
20 shopping and do some other things for fun while watching the
21 marathon. And I also have appointment in Apple store for
22 fixing my phone, so I guess we just decide to go to Prudential
23 and then Apple store is around, so we can find a place to cross
24 the street so we can go to the Apple store.

25 And after we get there and go to the Prudential, we find

1 it's really hard to go to Apple. We can't cross the street.
2 It's very far. And we have to walk a long distance to cross
3 the street. So we walk and then we cross the street and walk
4 back. It's too -- it's going to take awhile, so I cancel the
5 appointment at Apple and make a new one.

6 Q. Okay. Let me just stop you there for a second. So at
7 first Lingzi said she couldn't attend with you the marathon?

8 A. Yes.

9 Q. But then she changed her mind?

10 A. Yes.

11 Q. And then you began to go down -- you took the train down
12 to the marathon area?

13 A. Uh-huh.

14 Q. And that's from Boston University?

15 A. Yes.

16 Q. And who else was with you?

17 A. My other friend, another Chinese friend can go with,
18 Tiffany.

19 Q. And so there's Tiffany, Lingzi and you went down towards
20 the marathon -- towards the Boylston Street area. Is that
21 right?

22 A. Yes.

23 Q. And you were intending to go to the Prudential Center to
24 do shopping?

25 A. Yes. I can't remember if -- I don't think we really

1 bought anything; we just more like watching the marathon.

2 There is way too many people and we are short, so it's hard to
3 see. So we go shopping, and then just going to someplace more
4 empty.

5 Q. Yeah, just to free up.

6 And then you mentioned you had scheduled an appointment at
7 the Apple store?

8 A. Yes.

9 Q. But then you cancelled the appointment?

10 A. Yes. I can't remember if we just missed it or cancelled,
11 I guess.

12 Q. But you had to reschedule the appointment, in any event?

13 A. Yes.

14 Q. So then what happened after you were -- you tried
15 to -- you rescheduled the appointment?

16 A. We rescheduled appointment because we feel, like, too
17 tired. We don't want to -- in a rush. So we go on the
18 Boylston -- Newbury Street instead of Boylston Street because
19 it's too crowded to walk. And then we go to a restaurant on
20 Newbury Street just to eat some food and then stay there for a
21 while, and then after that we keep walking on the Newbury
22 Street. We try to walk back to the Boylston Street, but it's
23 still very crowded, so we decide to keep walking on the Newbury
24 Street.

25 And I think one block -- two blocks before the Apple store

1 we decide to take a turn because it's very close, so we take
2 turn on the Boylston Street and then walk a little bit. And
3 when we reach the restaurant, and then the first bomb just
4 exploded --

5 Q. Let me stop you here just to orient the jury as to where
6 you are. You'd gone down Newbury Street. You had eaten lunch.
7 Is that right?

8 A. Yes.

9 Q. And then you went back onto Boylston Street?

10 A. Yes.

11 Q. And then just as you -- somewhere near the finish line,
12 you had passed that area, and then the first bomb blew up?

13 A. Yes; sort of close to the finish line.

14 Q. Okay. And where approximately on Boylston Street were you
15 when that happened?

16 A. When the first bomb happened?

17 Q. Yes.

18 A. Right in front of that restaurant, the --

19 Q. Is it the Forum restaurant?

20 A. The Forum restaurant.

21 Q. Okay. And you weren't familiar with the Forum restaurant
22 at the time, correct?

23 A. Not really. We still go around that area a lot, but we
24 never eat in that restaurant before.

25 Q. Okay. And so who was there in front of the Forum

1 restaurant when the first bomb blew up?

2 A. There is a couple on my right side, a woman -- very tall
3 woman, her boyfriend, I guess, or her husband, and then there's
4 two guys in front of us. Like still a lot of people in front
5 of us. And then when we reach there, my friend is like --
6 Tiffany is not there because when we take the first turn to the
7 Boylston Street, she decide to take a picture. There is a
8 stone or something, she can stand up there, so she can take a
9 picture. And then Lingzi and I went to the Apple store. So
10 that's why we're not together at that point.

11 Q. Okay. So the three of you split up a little bit. Tiffany
12 stopped to take a photo, and you and Lingzi kept going up
13 westbound on Boylston Street towards the Apple store?

14 A. Yes.

15 Q. Okay. When the first bomb exploded, how did you know that
16 something happened?

17 A. I didn't really know that's a bomb. So when the first
18 bomb -- the first thing happened, everybody around there is
19 like shocked. So everyone is panicked. Everybody is asking,
20 "What's happening? What's that?" I never think it's a bomb; I
21 just thought something happened, like noise, something like
22 that.

23 And then people were in a panic, I guess, because they saw
24 the smoke. There's some smoke we can see from the finish line.
25 And I guess I'm not nervous about anything at that point. I

1 just think it's just something, we don't know, but it cannot be
2 a bomb or anything like that. So I was trying to calm my
3 friend -- calm Lingzi too. She was worried too. And also the
4 couple I mentioned before, because they are panicked, so I'm
5 just looking at them to see what is happening.

6 And then Lingzi's holding my arm at that point. I just
7 trying to -- about to tell her, "Let's keep moving. It's okay.
8 Let's go." And then I haven't got a chance to say that, the
9 second bomb.

10 Q. Okay. Let me show you a couple of photos before we move
11 on.

12 A. Okay.

13 MR. CHAKRAVARTY: Can you call up -- these have not
14 yet been introduced. 21-1, -2 and -3 just for the witness.

15 Q. Ms. Zhou, is this one of the photos I showed you recently?

16 A. Yes.

17 Q. And do you recognize it as a photo of the time when you
18 and Lingzi were walking by the Forum Restaurant on April 15,
19 2013?

20 A. Yes, I can see her.

21 Q. Okay. You can see Lingzi in this one?

22 A. Yes.

23 MR. CHAKRAVARTY: Okay. Can we have 21-2.

24 Q. And do you see yourself in 21-2?

25 A. Yes.

1 MR. CHAKRAVARTY: 21-3.

2 Q. And do you see yourself in 21-3 and Lingzi's hand?

3 A. Yes.

4 Q. And are these fair and accurate photos of you and Lingzi
5 just before the second bomb blasted?

6 A. Yes. I can see the couple next to me too.

7 Q. Okay.

8 MR. CHAKRAVARTY: I'd move in Exhibits 21-1, -2 and
9 -3.

10 MS. CLARKE: No objection.

11 THE COURT: Okay.

12 (Government Exhibit Nos. 21-1, 21-2 and 21-3 received
13 into evidence.)

14 MR. CHAKRAVARTY: I would move to publish Exhibit
15 21-1, please.

16 BY MR. CHAKRAVARTY:

17 Q. Ms. Zhou, is this the photo that you said depicts Lingzi
18 Lu?

19 A. Yes.

20 Q. Using your finger, can you just draw a circle on the
21 screen in front of you? If you push a little bit hard with the
22 pad of your finger as you draw on the touch screen.

23 A. (Witness complies.)

24 Q. So you've just circled the woman in the blue jacket on the
25 left-hand side of the screen. Is that right?

1 A. Yes. I think it's a shirt.

2 Q. That's a shirt? I'm sorry. Not a jacket.

3 And does it appear she's holding her hand up to her mouth?

4 A. Yes.

5 Q. And describe what had just happened at this point. Take a
6 moment.

7 (Pause.)

8 A. I think the first bomb just happened at that point, so
9 everyone is looking. And she's in a panic.

10 MR. CHAKRAVARTY: Can we have 21-2, please?

11 Q. Do you see yourself in this photo?

12 A. Yes.

13 Q. Please, there's a tissue and there's also some water there
14 if you want some.

15 (Pause.)

16 Q. Can you circle yourself on this photo?

17 A. (Witness complies.)

18 Q. Thank you. And where is Lingzi in this photo?

19 A. Right next to me, I think.

20 Q. And you've circled yourself, the woman in the, more or
21 less, upper center of the photo?

22 A. I think she's on my left side.

23 Q. So behind the blonde woman?

24 A. Yes.

25 MR. CHAKRAVARTY: And can we go to 21-3, please.

1 Q. Now, again, can you circle yourself in 21-3.

2 A. (Witness complies.)

3 Q. And do you see a part of Lingzi in this photo?

4 A. Yes, her head.

5 Q. And is she holding your shoulder?

6 A. Yeah; like she's grabbing my arms.

7 Q. So were you particularly concerned about what had happened
8 down at the finish line area?

9 A. At that point, no, because I can't see anything besides
10 the smoke. I can only see there is the smoke up there. And
11 everyone is panicked. I don't know why. I never feel
12 something like that would happen. I feel safe, so...

13 Q. And Lingzi, you said she was a little bit panicked?

14 A. Yes, she scared, like everyone around. Like I
15 guess -- like everyone is kind of worried about what's
16 happened -- what's happening.

17 Q. Did she say anything?

18 A. Yeah, she was asking me, like, "What's happened?" and
19 "What should we do?" something like that, like everyone else.

20 Q. And did you respond?

21 A. I said, "It should be okay. Calm down," or things like
22 that. I don't know what answer to give because I don't know
23 what's happening too. And I just feel like it shouldn't be a
24 big problem; it should be just noise or something like that,
25 just like construction work or something like that.

1 Q. Moments after this photo was taken -- I think this is a
2 still image from a video. Moments after this image, what
3 happened?

4 A. I remember like before I start -- at first I was looking
5 at the couple next to me so -- and then just like after a few
6 seconds, maybe, and then I turn back, trying to tell -- I'm
7 about to tell her to -- let's go, and then I think the second
8 bomb just exploded at that point, because I don't have a memory
9 of those few seconds.

10 Q. Okay. What is the next thing you remember?

11 A. I remember I wake up laying on the fence, and it's like
12 smoke everywhere. And I can't hear anything at that point. I
13 saw blood, like, all over the ground. And I remember there is
14 a man stand right in front -- used to be stand right in front
15 of me, and at that point he's sitting down and turning his face
16 towards me, like in a very slow, slow way. It's like slow
17 motion. And then I can see his face. It's very scared. And I
18 think he's yelling, but I cannot hear anything. So he's
19 turning his face towards me, and I saw his legs not there
20 anymore.

21 And then I start to check my arms and my legs, and
22 Lingzi's arms and legs. I saw I have both my legs and my arms,
23 so -- and I didn't see any wound at that point; I only saw
24 blood, and so I satisfied. And then I saw Lingzi's legs and my
25 legs are actually together, like kind of across each other.

1 Q. Like intertwined, your legs and Lingzi's legs?

2 A. Yes. Yes.

3 So I tried to stand up. So I put my leg out, and trying
4 to stand up, and then I figure at that point I'm injured. And
5 then --

6 Q. Let me stop you there and just again clarify just a few of
7 the things. You said that you were lying against a fence?

8 A. Yes.

9 Q. Is that right?

10 And the man that you saw who no longer had legs, did you
11 see that man moments before?

12 A. I think he's one of the men standing right in front of me,
13 but I didn't see his face before because they are facing a
14 different way.

15 Q. So you were facing his back?

16 A. Yeah, I'm facing his back.

17 Q. And you said you saw that you had your limbs?

18 A. Yes.

19 Q. Did you make observations of Lingzi at that time?

20 A. Yes. After I checked myself, I start to check her wound,
21 and that's why I tried to stand up. And then I saw she has her
22 arms and legs, but she's injured in her leg, her thigh. But I
23 felt like it should be okay at that point.

24 Q. Okay. Let me stop you there. When you looked -- turned
25 to look to see if she was okay, you saw that she had her arms

1 and legs. Is that what you said?

2 A. Yes.

3 Q. But she had an injury to her thigh?

4 A. Yes.

5 Q. Okay. And you said that you thought she would be all
6 right? Why did you think that?

7 A. Because when I tried to stand up, I notice that I can't.
8 Then I figure out I was injured. I have abdominal injury. So
9 I had to sit back. And then I...

10 (Pause.)

11 A. I was thinking it may be better if I lose my arms or legs
12 because I think then I have a chance to survive. Because my
13 wound, I have to hold it, so... Like whole thing coming out
14 from my insides. So I think it's kind of dangerous for me. So
15 I sit there. I sit back. I stop trying to move. And I was
16 holding my stomach at that point. And then I check Lingzi's
17 wound. I saw she -- she's yelling, so I know she's alive. And
18 I tried to talk to her, but I can't at that point. And so I
19 think I should try to calm her down.

20 (Pause.)

21 Q. Ms. Zhou, let me ask you another question. You said you
22 tried to stand up but you couldn't?

23 A. Yes.

24 Q. What was preventing you from standing up?

25 A. Well, it hurt. And also, just you don't have strength to

1 stand up and...

2 Q. I'm sorry. Go ahead.

3 A. And I realized if I try to stand up, like my -- because I
4 got cut, because of the bomb, on my stomach, so if I try to
5 stand up, I don't think there is a good result.

6 Q. And so your stomach was cut open?

7 A. Yes, something like that.

8 Q. And so in addition to -- I think you said you didn't have
9 the strength to stand up --

10 A. Yes.

11 Q. -- you were worried that your insides would come out?

12 A. Yes.

13 Q. And what were you doing in response to that?

14 A. So I sit back. I didn't move. And then I hold it.

15 Q. You were holding your --

16 A. Yeah --

17 Q. -- insides in?

18 A. -- I need to push, like, with all my strength I have. So
19 I pushed my stomach. And that also help with the pain.

20 Q. You said you saw Lingzi next to you?

21 A. Yes. Yes.

22 Q. And in addition to the injury that you saw, what was she
23 doing?

24 A. I saw she's yelling. I can't hear, so I can only saw
25 she's yelling, and she's waving her hand a little bit. And

1 she's like lying down. And so I can saw her leg. I can saw
2 her injury. At that point you wouldn't think that's something
3 hard -- it's hard to look at because everybody's injured. And
4 you just feel like it's something you have to look at to take
5 care of.

6 So I look at her leg. I think it's better than the man in
7 front of me because he doesn't have leg anymore. So I think
8 she should be fine. And then I just -- I -- kind of like a
9 relief, I think she would be fine. So I just sit back. And
10 then lots of people come inside and trying to help and...

11 Q. So at that point could you see Lingzi anymore?

12 A. After a while I cannot see her because people were --
13 people get in and block the way. So I cannot see any other
14 injured people.

15 Q. Were people attending to you?

16 A. There were lots of people -- yeah.

17 Q. And were people attending to her?

18 A. Yeah, I think so.

19 Q. And others around you as well?

20 A. Yeah, everyone has a couple of people trying to help.

21 Q. So explain what happened when the responders came to you.

22 A. So there is -- so people came and tried to help, but they
23 need to know what kind of injury you had, so every -- like it's
24 a little bit messy there. So if -- so, for example, there's
25 one coming to you and then somebody else is yelling for help,

1 and then they left and then somebody else came. So every time
2 if they changed, you have to show them your wound, what injury
3 you are. So it's really painful to kind of reveal it every
4 time. So then there's --

5 Q. Let me just clarify that. You said it's painful to reveal
6 your wound --

7 A. Yes.

8 Q. -- every time a first responder comes to you?

9 A. Yes.

10 Q. Please continue.

11 A. So I remember there is a lady who came to help and then
12 she tell me she's a nurse and everything, and like what's her
13 name and she's going to help me. And then she tried to leave.
14 I just can't take changing -- every -- just changing people, so
15 I hold her pants -- like the bottom of her pants.

16 Q. You tugged on her pants to prevent her from leaving?

17 A. Yeah, yeah, so I -- because I don't want to talk. I can't
18 really easy talk. And I told her, "Can you stay here?" and she
19 stayed. And after a while it's hard to brace, so I tried to
20 move, I tried to lie down. I thought it would be easier, but
21 it's actually harder. Like I want to throw up, so it will be
22 even harder to breath.

23 Q. When you say "breath," you mean to breathe?

24 A. Yeah, breathe.

25 Q. Air coming in and out?

1 A. Yeah.

2 So I lean backwards, still sit there. And then it's still
3 hard -- getting harder and harder, and then -- because there's
4 a restaurant there, so people bring ice out. And they put ice
5 in my mouth. It helps a lot. It just easier to breaths -- to
6 breathe. And then just wait.

7 And then there's two ambulance -- or one ambulance come
8 and take the people right in front of me. And then I ask how
9 long I should keep waiting, to tell me like soon. And I know
10 the help is coming, but it just hard to wait there like that.
11 And --

12 Q. Let me stop you before we talk about you leaving there.
13 I'm going to show you a couple of photographs and ask if you
14 can talk about those. I think the first is Exhibit 34.

15 MR. CHAKRAVARTY: 34 is in evidence, your Honor.

16 Q. Ms. Zhou, do you see yourself in this photo?

17 A. Yes.

18 Q. Again, can you circle yourself?

19 A. (Witness complies.)

20 Q. You circled the woman with her head down and looking off
21 to the side a little bit. Seeing this photo, can you tell the
22 jury what you think was happening there?

23 A. I think that's just like after the bomb. And then I just
24 wake up and then trying to figure out all wounds.

25 Q. And where's Lingzi relative to you?

1 A. I think she's just right next to me, behind the man.
2 Because I remember she's very close to me.

3 Q. And the man that you were talking about in front of you,
4 is that the man depicted in this photo?

5 A. Yes, behind the tree.

6 MR. CHAKRAVARTY: Let me have 24, which is also in
7 evidence, your Honor.

8 Q. Okay, Ms. Zhou. Can you identify yourself in this photo
9 as well as Lingzi?

10 A. So this is me and this is (indicating).

11 Q. You've circled the woman on the left as being you?

12 A. Yes. And this is Lingzi (indicating).

13 Q. And you've circled the woman with her hands over her face
14 lying down as Lingzi?

15 A. Yes.

16 Q. Does this appear to be shortly after the earlier photo
17 that we looked at?

18 A. Yes, I think so.

19 Q. Can you describe what you were doing here?

20 A. I guess I'm just looking around and just -- I guess just
21 waiting.

22 Q. Were you trying to conserve your energy?

23 A. Yes.

24 Q. Why?

25 A. Because I assume the soonest -- the soonest way the

1 ambulance would come definitely takes more than five minutes.
2 And because I'm injured, I don't have lots of energy; I don't
3 want to waste them. So everyone was yelling, and I just sit
4 there. I thought I shouldn't waste any energy to just yelling,
5 and that will increase my heart speed and my bleeding. So if I
6 yelling, then I will bleed faster, that will cause lots of
7 problem.

8 Q. Do you remember being able to hear when you were sitting
9 there?

10 A. At the first, maybe one minutes or something like that, I
11 cannot hear. And then the hearing is coming back. And then I
12 think it started to come back when people screaming. And then
13 I can hear people are talking like, about, "Help this one, he
14 got injured," something like that.

15 Q. Do you remember what it smelled like?

16 A. I can't remember what it smelled like. Smoke. Smoke.
17 Just smoke. It -- it's more like all the things has been shut
18 down, only nothing you can look at.

19 Q. All your senses had shut down?

20 A. Yeah, it feels like that way, so you cannot hear, you
21 cannot smell, I guess. I just focus in on what I saw, I think.

22 Q. Were you taken to the hospital?

23 A. Yes.

24 Q. And did you learn what your injuries were?

25 A. I think it's pretty clear to me at that point because I

1 saw it. And besides that, because of the bomb, I guess I'm
2 close -- very close, so my eardrum has injury too. So there is
3 holes in my eardrum. I guess it happens to lots of people.

4 Q. Did you receive nerve damage as well?

5 A. Yes, because of the cutting, that injured my nerves to
6 control the right leg.

7 Q. Did they go into surgery to repair your abdomen?

8 A. Yes, I had surgery right after the bomb twice, just to
9 clean up the wound. And then because there is something get
10 inside your body, so it is very easy to get infection. So I
11 got infection right after I get out of the hospital. So I get
12 back in again.

13 Q. About how long were you in the hospital as a result of
14 your injuries?

15 A. I think it's around 20 to 30 days, I think. It's hard to
16 track the time.

17 Q. When you first arrived at the hospital, did you go -- when
18 you went to get operated on, did you go to the ICU?

19 A. Yes. So when I got off the ambulance, there is doctors
20 waiting. So I guess I directly go to the surgery room, and
21 there I remember there is a doctor lady. She's there. She
22 says like she -- they all keep asking me about my -- something
23 like if you're allergic to anything, so I told them no. And
24 then I ask her if I can sleep, and she says yes, so I just
25 sleep.

1 Q. When you woke up did you have visitors, and you talked to
2 others about what happened?

3 A. Yes. When I first wake up, I was in ICU and I can't talk
4 because I have that machine in my mouth and nose, so -- to help
5 me breathe. And then I saw the -- my friends and Chinese
6 Embassy is there, and so I write down things. I can only
7 write. So I was lying there and write, "Tell them to find my
8 friend." I write down her name.

9 (Pause.)

10 A. And also tell the nurse and doctors, my friends and
11 everyone to look for her.

12 Q. And you were talking about Lingzi?

13 A. Yes.

14 Q. When did you hear what had happened to Lingzi?

15 A. I don't know how long it takes, but like after a while --
16 like I keep waking up and then go back to sleep because of the
17 medicine I'm taking. And then all the family friends was
18 visiting and then I, like -- every time I wake up, I ask them
19 whether or not they find her. And so I ask again, and then he
20 says -- oh, he says, like, she passed away, and you don't know
21 that? So I guess everyone find out earlier, but they trying to
22 protect me, so they didn't tell me.

23 MR. CHAKRAVARTY: Would you call up just for the
24 witness, your Honor, Exhibits 1499 through 1501.

25 Q. Ms. Zhou, do you recognize 1499?

1 A. Yes.

2 Q. Who is that?

3 A. That's Lingzi.

4 MR. CHAKRAVARTY: 1500.

5 Q. Who's that?

6 A. That's her.

7 MR. CHAKRAVARTY: 1501.

8 Q. And who is that?

9 A. That's her too.

10 MR. CHAKRAVARTY: I'd move in 1499 to 1501.

11 MS. CLARKE: No objection.

12 THE COURT: Okay.

13 (Government Exhibit Nos. 1499, 1500 and 1501 received
14 into evidence.)

15 MR. CHAKRAVARTY: And I would ask to publish 1500.

16 BY MR. CHAKRAVARTY:

17 Q. Do you recognize this photo?

18 A. Yes.

19 Q. Who took it?

20 A. I took it.

21 Q. Approximately when?

22 A. I can't remember. Just, that's kind of a regular day for
23 us, so we just hanging out. And I think this is a restaurant
24 close to the Fenway Park. If it's correct, I think it's a Thai
25 restaurant, and we are just -- I guess we are there for a

1 movie, and then too early, or just after movie, so we decide to
2 eat things, and we just walk inside and take a picture.

3 Q. That was a typical day for you?

4 A. That's kind of our day for every day.

5 MR. CHAKRAVARTY: Thank you, your Honor.

6 THE COURT: Any examination?

7 MS. CLARKE: No. Thank you very much. No questions.

8 THE COURT: Thank you, Ms. Zhou.

9 THE WITNESS: Thanks.

10 (The witness is excused.)

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C E R T I F I C A T E

I, Marcia G. Patrisso, RMR, CRR, Official Reporter of the United States District Court, do hereby certify that the foregoing transcript constitutes, to the best of my skill and ability, a true and accurate transcription of my stenotype notes taken in the matter of Criminal Action No. 13-10200-GAO, United States of America v. Dzhokhar A. Tsarnaev.

/s/ Marcia G. Patrisso
MARCIA G. PATRISSE, RMR, CRR
Official Court Reporter

Date: 4/28/15